

EXHIBIT A



E. EVANS WOHLFORTH, JR.

666 Third Avenue, 20th floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com
Direct (212) 451-2954

Admitted in New York
and New Jersey

December 13, 2024

VIA E-Mail

Hon. Freda L. Wolfson, U.S.D.J. (ret.)
Lowenstein Sandler LLP
One Lowenstein Drive
Roseland, New Jersey 07068

**Re: *Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,
Express Scripts, Inc., and Accredo Health Group, Inc.*
No. 2:22-cv-02632 (JKS) (CLW)**

Dear Judge Wolfson:

On behalf of Save On SP, LLC (“SaveOn”), we write to request an Order compelling Johnson & Johnson Health Care Systems, Inc. (“JJHCS,” and, with its affiliates, “J&J”) to run a search term over Scott White’s files to capture documents related to his unique role drafting CarePath’s Terms and Conditions (“T&Cs”) from January 1, 2009 to April 1, 2016 (the “Drafting Time Period”).

White created CarePath. During the Drafting Time Period, he progressed from Director of Marketing for different Janssen products (2009-2012), to Vice President overseeing JJHCS on the

Strategic Customer Group (“SCG”)¹ (2012-2014), *see* Ex. 2 at -769 (JJHCS_00039767) ([REDACTED]
[REDACTED], to President of Oncology (2014-2017), *see* Ex. 3 (LinkedIn for
Scott White). In these roles, White worked on creating CarePath from various predecessor pro-
grams and on drafting CarePath’s T&Cs.

White designed and implemented strategic changes to CarePath’s predecessor programs [REDACTED]
[REDACTED]. *See* Ex. 4 at -034 (JJHCS_00261032) ([REDACTED]
[REDACTED]). [REDACTED]
[REDACTED]. *See* Ex.
5 (JJHCS_00225682) ([REDACTED]
[REDACTED]
[REDACTED]); Ex. 7 (JJHCS_00260810)
([REDACTED]
[REDACTED]); Ex. 8 at -312 (JJHCS_00226311) ([REDACTED]
[REDACTED]); Ex. 9 at -105-106 (JJHCS_00235102) ([REDACTED]

¹ The SCG monitors the marketplace and designs strategies for J&J to remain competitive by, among other things, changing its copay assistance programs. *See* Ex. 1 at -.001 (JJHCS_00000558) ([REDACTED]
[REDACTED])

² The NALT is a predecessor to the Janssen Americas Leadership Team (“JALT”), the committee at Janssen that makes the highest-level strategic decisions for the Janssen Pharmaceuticals family of companies, which White served on through at least 2022. *See* Ex. 6 at -.009 (JJHCS_00001542) [REDACTED]
[REDACTED] As J&J acknowledged, the JALT has members whose roles require that they “supervise CarePath.” June 27, 2023 Tr. at 62:3-14.

[REDACTED]); Ex. 10 at -110-111 (JJHCS_00235109) ([REDACTED]
[REDACTED]).

During this period, White also had the authority to exempt patients from various changes to the T&Cs. *See* Ex. 11 at -185 (JJHCS_00225184) ([REDACTED]
[REDACTED]);
see also Ex. 12 (JJHCS_00225190) [REDACTED]). White also helped create new co-pay assistance programs for new Janssen drugs. Ex. 13 at -766-67 (JJHCS_00260764) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]).

Then White created CarePath. [REDACTED]
[REDACTED]
[REDACTED]. Ex. 14 at 20-21, 52 (JJHCS_00256250) ([REDACTED]
[REDACTED]); *see also* Dkt. 146 at 25 ([REDACTED]
[REDACTED]).
[REDACTED]. Ex. 14 at 6 (JJHCS_00256250).

Your Honor first ordered J&J to add White as a custodian at the January 24, 2024 conference, *see* Dkt. 192 at 30, directing J&J to run “limited” search terms targeted to capture documents on issues where SaveOn could demonstrate his unique and active involvement, Jan. 24, 2024 Tr. at 128:22-129:5. In April, after J&J made new productions showing that White worked extensively on the CAP program, Your Honor ordered J&J to run additional CAP-related search terms over his documents, including one to capture documents about his approval of a \$200-million dollar Work Order with TrialCard. *See* Dkt. 305 at 3-4. At those same conferences, Your Honor ordered

J&J to produce documents from the Drafting Time Period. *See* Dkt. 192 at 10 (ordering J&J to search for and produce documents); Dkt. 305 at 3 (ordering J&J to “further investigate” additional custodians beyond the two it originally identified, Wortman and Chapman).

J&J’s productions from the Drafting Time Period show that White likely possesses unique, important documents related to the drafting process for CarePath’s earliest T&Cs. As Your Honor found, J&J’s work to create CarePath out of its “predecessor programs” is relevant to the meaning of the current CarePath T&Cs. *See* Dkt. 192 at 10. J&J’s productions from lower-level custodians during the Drafting Time Period do not contain any documents reflecting an intent by J&J that would be consistent with the May-Not-Use Provision barring patients on SaveOn-advised plans. White, who oversaw the creation CarePath, is highly likely to have this information, if it exists.

J&J’s current production also lacks full information regarding White’s many relevant meetings about the T&Cs with non-custodians. While J&J produced a [REDACTED], Ex. 5 (JJHCS_00225682), it has not produced any documents relating to NALT meetings before or after Wortman’s brief involvement, including about the decisions to consider changes to the [REDACTED] and to make White the Project Sponsor for J&J’s initiative to create CarePath. While J&J produced [REDACTED], *see* Ex. 9 at -105-06 (JJHCS_00235102), it has not produced documents relating to his discussions of those changes with non-custodians, including the President of Immunology,³ *see* Ex. 10 at -110-11 (JJHCS_00235109); *see also* Ex. 15 (JJHCS_00225849) ([REDACTED]). And, while

³ Immunology is the brand associated with, among other drugs, Stelara, Tremfya, Simponi, and Remicade.

J&J produced [REDACTED]

[REDACTED], Ex. 12 (JJHCS_00225190), it has not produced documents regarding how he made the decision or any discussions about it.

To address these gaps, SaveOn proposes that J&J run a single search term over White’s files from January 1, 2009 to April 1, 2016:

- (CarePath OR “Savings Program” OR “Rebate Program” OR “Access Program” OR “copay assistance” OR “Instant Savings Card” OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/10 ((term* w/3 condition) OR “T&C” OR “TNC” OR “other offer” OR “coupon*” OR “discount*” OR “free trial” OR “prescription savings card”)

According to hit counts produced by J&J, this search identifies 1,214 documents (with families, 4,809 documents. *See* Ex. 16 at 6 (Sep. 13, 2024 Ltr.).

J&J refuses to run this term, saying it is not “limited.” Ex. 17 at 2 (July 8, 2024 Ltr.) (quoting Jan. 24, 2024 Tr. at 128:14-25); Ex. 18 at 1 (Oct. 22, 2024 Ltr.) (same). In truth, it is narrowly tailored to the drafting issues with which White was demonstrably involved; the fact that it identifies 1,214 documents in White’s files shows that White was heavily involved in relevant work drafting early CarePath T&Cs. J&J effectively agreed that the term is proportional by agreeing to run it for six of its eight existing custodians from the Drafting Time Period—Andrea Winkler, Karen Lade, Adrienne Minecci, Jeff Doherty, Rhonda Burden, and Darryl Stiles, *see* Ex. 19 (Jul. 25, 2024 Ltr.)—and an even broader search term over the files of the two others—Wortman and Katherine Chapman, Ex. 20, App’x 1 at v (Aug. 8, 2024 Ltr.).

Finally, while J&J complains about the number documents to review, Ex. 18 at 4-5 (Oct. 22, 2024 Ltr.), 4,809 total documents are hardly an undue burden in this context given the scope of the case, the critical relevance of drafting documents, and the many gaps in J&J’s production on that topic to date, Jan. 24, 2024 Tr. at 12:14-13:16 (“The crux of this case is going to

Hon. Freda L. Wolfson

Page 6

be what ‘other offer’ means. ... burden is something you are allowed to assert ... but I think [J&J] [has] a high hurdle there.”). Your Honor should compel J&J to run the requested term over White’s custodial files for the Drafting Time Period.

SaveOn appreciates Your Honor’s attention to this matter.

Respectfully submitted,

/s/ E. Evans Wohlforth, Jr.
E. Evans Wohlforth, Jr.
Robinson & Cole LLP
666 Third Avenue, 20th floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com

Philippe Z. Selendy (admitted *pro hac vice*)
Andrew R. Dunlap (admitted *pro hac vice*)
Meredith Nelson (admitted *pro hac vice*)
Elizabeth H. Snow (admitted *pro hac vice*)
SELENDY GAY PLLC
1290 Avenue of the Americas
New York, NY 10104
(212) 390-9000

pselendy@selendygay.com
adunlap@selendygay.com
mnelson@selendygay.com
esnow@selendygay.com

Attorneys for Defendant Save On SP, LLC

Exhibits 1-2

Confidential – Filed Under Seal

Exhibit 3



Search



Home



My Network



Jobs



Messaging



Notification



Leading where
medicine is going

Scott White · 3rd

Chief Operations Officer, NA Innovative Medicine at Johnson & Johnson

Titusville, New Jersey, United States · [Contact info](#)

500+ connections

[Message](#)[Connect](#)[More](#)

Johnson & Johnson
Innovative Medicine



Rutgers, The State University
of New Jersey-New Brunswick

About

In my role as Chief Operations Officer for Johnson & Johnson Innovative Medicine North America, I am proud to lead our critical business operations that are leading where medicine is going. As a leader across crucial business functions including Strategic Customer Group, Scientific Affairs, Patient Engagement and Customer Solutions and the Established Products and Operations Group, I am helping lead the execution of commercial strategies, market access, and provider and patient support for our medicines. I also provide important commercial leadership and insights in shaping our Policy & Advocacy strategies. I proudly represent Johnson & Johnson on the Board of Directors of the Biotechnology Innovation Organization and serve as a member of the CEO Roundtable on Cancer.

In my career at Janssen, patients have always been my passion. I'm results-focused and driven to advance health equity for all. Prior to my current position, I was President of Janssen U.S. Immunology, where I spearheaded a high-performing team making a meaningful difference for people with debilitating autoimmune diseases. I additionally served as the President of Janssen U.S. Oncology, where I led an innovative team that launched transformational cancer treatments.

I graduated from Rutgers, The State University of New Jersey, with a B.A in molecular biology and philosophy, and have a Master of Business Administration from the University of Phoenix.

Activity

7,055 followers

Scott White commented on a post · 1d

Congratulations Wanda and thanks for your leadership through the years! Best to you and your family!

Scott White commented on a post · 5mo

Congratulations!!



Search



Home



My Network



Jobs



Messaging



Notifications

**Scott White**

Chief Operations Officer, NA Innovative Medicine at Johnson & Johnson

Scott White commented on a post • 6mo

Wow! Congratulations!!

[Show all comments →](#)

Experience

**Chief Operations Officer, NA Innovative Medicine**

Johnson & Johnson Innovative Medicine • Full-time

Nov 2023 - Present • 1 yr 2 mos

United States • On-site

**Company Group Chairman North America Pharmaceuticals**

Johnson & Johnson

Aug 2018 - Nov 2023 • 5 yrs 4 mos

**The Janssen Pharmaceutical Companies of Johnson & Johnson**

4 yrs 3 mos

Horsham, Pennsylvania

**President, Immunology**

Apr 2017 - Aug 2018 • 1 yr 5 mos

**President, Oncology**

Jun 2014 - Sep 2017 • 3 yrs 4 mos

**Vice President, Strategic Customer Group**

Johnson & Johnson

Sep 2012 - Dec 2014 • 2 yrs 4 mos

As Vice President, Strategic Customer Group, Scott led contracting, healthcare policy, advocacy, affordability, market access, trade relations/operations, and account management for all Janssen U.S. businesses.

**Vice President Immunology Marketing**

The Janssen Pharmaceutical Companies of Johnson & Johnson

Mar 2010 - Oct 2012 • 2 yrs 8 mos

**Director of Remicade Marketing**

Centocor Ortho Biotech Products

2009 - 2010 • 1 yr



Search



Home



My Network



Jobs



Messaging



Notificatio

**Scott White**

Chief Operations Officer, NA Innovative Medicine at Johnson & Johnson

**Director of Marketing Oncology**

Centocor Ortho Biotech, Inc

2007 - 2009 · 2 yrs

**Ortho Biotech**

10 yrs 1 mo

- **Group Product Director Oncology**
2005 - 2007 · 2 yrs
- **Regional Business Director Oncology**
2003 - 2005 · 2 yrs
- **Product Specialists/Sales Training/District Manager/Product Management**
1997 - 2003 · 6 yrs

Describe your position

**Drug Discovery and Clinical Research Associate**

RW Johnson Pharmaceutical Research Institute, Johnson & Johnson

1990 - 1997 · 7 yrs

Education**Rutgers University**

Bachelor of Arts (B.A.), Biology

1985 - 1990

**University of Phoenix**

MBA, Technology Management

2002 - 2004

Skills**Oncology**

Endorsed by Sunny Singh and 25 others who are highly skilled at this



Endorsed by 10 colleagues at Johnson & Johnson Innovative Medicine



99+ endorsements



Search



Home



My Network



Jobs



Messaging



Notification

**Scott White**

Chief Operations Officer, NA Innovative Medicine at Johnson & Johnson

Clinical Development



Endorsed by Scott Barrett, M.D. and 2 others who are highly skilled at this



Endorsed by 2 colleagues at Johnson & Johnson Innovative Medicine



82 endorsements

[Show all 34 skills →](#)

Recommendations

Received

Given

**Chris Shanahan** · 3rd

Hematology/Oncology | Rare Disease | Senior Sales Executive

March 17, 2010, Chris worked with Scott on the same team

Scott is one of the brightest sales and marketing professionals I have ever worked with. Scott was seen as the leader among his peers in developing highly executable solutions to complex challenges. He is a consistently high performer that works tirelessly to exceed expectations in all his responsibilities. Scott is a talented motivator and developed several of his direct report to positions of greater responsibility. I highly recommend Scott to any organization seeking a highly talented and accomplished sales & marketing executive.

**Jim Linzer** · 3rd

Broad healthcare experience in the US market recently led to a new client, a biopharma company in Japan.

June 2, 2008, Jim worked with Scott but on different teams

Scott exemplifies the ability to convert clinical knowledge, product knowledge into true marketing. Since his sales management days, Scott has always been impressive with customers and a genuine leader when sharing his expertise and experience with new sales people, senior sales people and certainly with customers. Scott is well known throughout professional organizations in the oncology community and has been a strong asset to Ortho Biotech for many years.

[Show all 4 received →](#)



Home



My Network



Jobs



Messaging



Notification

**Scott White**

Chief Operations Officer, NA Innovative Medicine at Johnson & Johnson

Interests

[Companies](#)[Groups](#)[Newsletters](#)[Schools](#)**Pfizer**

6,082,422 followers

[+ Follow](#)**Johnson & Johnson | Vision**

181,871 followers

[+ Follow](#)[Show all companies →](#)

Exhibits 4-15

Confidential – Filed Under Seal

Exhibit 16



September 13, 2024

Julia Long
(212) 336-2878

VIA EMAIL

Elizabeth H. Snow, Esq.
Selendy Gay, PLLC
1290 Avenue of the Americas
New York, NY 10104

Re: Apex Search Terms
Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,
2:23-cv-02632 (JKS) (CLW)

Dear Elizabeth:

We write in response to SaveOnSP's August 13, 2024 letter concerning SaveOnSP's request that JJHCS add eleven search terms over the custodial files of Scott White and Blasine Penkowski.

SaveOnSP continues to ignore the Court's clear guidance that search terms for Mr. White and Ms. Penkowski should be "[v]ery limited." Jan. 24, 2024 Tr. at 128:14–17. You may recall the following exchange that you had with Judge Wolfson in January:

JUDGE WOLFSON: Now, what are the limited search terms with regard to White and Penkowski that you want to use?

MS. SNOW: We're happy to provide a proposal on that.

JUDGE WOLFSON: Very limited.

MS. SNOW: Very limited, yes, your Honor.

JUDGE WOLFSON: Very limited.

Id. at 128:9–17. In the months that followed, the parties had extensive negotiations regarding the search terms to be run over Mr. White's and Ms. Penkowski's files and, to the extent the parties could not reach agreement, submitted any remaining disputes before Judge Wolfson. Judge Wolfson provided guidance at the April 3, 2024 conference, and the parties ultimately reached agreement on a range of search terms that required JJHCS to review thousands of documents from Mr. White and Ms. Penkowski's files for the period April 1, 2016 to November 7, 2023. SaveOnSP presents no reasoned basis to depart from the parties' early April agreement, which was

Elizabeth H. Snow, Esq.
September 13, 2024
Page 2

meant to “resolv[e] this dispute,” and at the time, JJHCS made explicit that it would “not agree to leave open the door for further search terms on this topic, a tactic frequently employed by SaveOnSP which seeks to avoid any binding judicial decision on the subject of discovery.” *See* Apr. 12, 2024 Ltr. from J. Long to E. Snow at 1.

Apparently unsatisfied, SaveOnSP returns months later to demand that JJHCS run eleven new search terms, apparently seeking to re-tread nearly every compromise search term proposal that JJHCS has offered on its non-apex custodians since the Court’s April 10, 2024 Order. Enough is enough. For the reasons set forth below, JJHCS will not run SaveOnSP’s search parameters, which would require the review of over 10,000 additional documents (inclusive of families).

I. Diversion Programs

SaveOnSP demands that JJHCS run two overbroad search terms based on Scott White and Blasine Penkowski’s purported use of the term “diversion programs” to refer to SaveOnSP, accumulators, and maximizers. *See* Aug. 13, 2024 Ltr. from E. Snow to J. Long at 1-2. Your letter, however, acknowledges that this phrase refers much more broadly to include not just “accumulators and maximizers,” but also [REDACTED] [REDACTED] *E.g.*, JJHCS_00273150. As you also acknowledge, several of the documents SaveOnSP seeks specifically refer to this action, which necessarily hits on the parties’ existing search capturing several variations of the word “SaveOn.”¹ JJHCS_00227401; JJHCS_00229802.

SaveOnSP’s proposed terms are also facially overbroad. SaveOnSP’s first term, which includes the term “divers*” would capture various commonly used words—e.g., “diversity” or “diversify”—that have nothing to do with the claims and defenses at issue in this action. Moreover, SaveOnSP’s remaining term, “diversion program*” includes no proximity limiters or connectors to other issues. JJHCS cannot agree to these terms, which are insufficiently tailored to information SaveOnSP now seeks.

JJHCS is prepared to rest on these objections and Judge Wolfson’s unambiguous guidance that “[v]ery limited” search terms should apply to Mr. White’s and Ms. Penkowski’s files. Nonetheless, in the interest of compromise, JJHCS is prepared to run the following terms, subject to SaveOnSP’s agreement that JJHCS’s agreement to do so would resolve the parties’ dispute.

¹ These include running the following terms for a seven-year period:

- “Save On” (case sensitive)
- SaveOnSP OR SaveOn OR “Save On SP” OR “Save OnSP” OR Save-On OR SOSP OR “Jody Miller” OR “Ron Krawczyk”

Elizabeth H. Snow, Esq.
September 13, 2024
Page 3

SaveOnSP's Proposal	JJHCS's Counterproposal
Diver* w/25 (copay* OR "co pay*" OR co-pay* OR (CarePath w/5 fund*) OR "patient assistance")	Diver sion * w/25 (copay* OR "co pay*" OR co-pay* OR (CarePath w/5 fund*) OR "patient assistance") w/25 (maximiz* OR accumul at *)
1,252 documents (family inclusive)	130 documents (family inclusive)
"diversion program*"	"diversion program*" w/25 (maximiz* OR accumul at *)
751 documents (family inclusive)	67 documents (family inclusive)

Please confirm whether SaveOnSP will accept JJHCS's counterproposal.

II. RIS RX

SaveOnSP also demands that JJHCS run two RIS Rx related search terms, claiming that JJHCS's "only argument to date against running search terms relating to RIS Rx . . . is the apex doctrine." Aug. 13, 2024 Ltr. from E. Snow to J. Long at 2 (citing Apr. 26, 2024 Ltr. from I. Eppler to E. Snow at 4, n.2). This misstates the parties' extensive negotiations and JJHCS's position articulated in its April 26, 2024 letter.

As you know, more than four months before your August 13, 2024 outreach, JJHCS offered to run four RIS Rx related search terms² over twenty-three custodians' files³ for a seven-year period. JJHCS had just two conditions: (1) that it would not run these terms over Mr. White's and Ms. Penkowski's files, and (2) that JJHCS's offer to run these terms was "subject to SaveOnSP's agreement that these search parameters would resolve JJHCS's discovery obligations

² Those terms are:

- (RIS OR RISRx) AND ((Benefit* w/5 Investigation*) OR B.I. OR "BI's" OR BIs OR "B.I.'s")
- (RIS OR RISRx) AND "BI" (*case sensitive*)
- (RIS OR RISRx) /50 (accumulator* OR maximizer*)
- (RIS OR RISRx) /50 (identif*)

³ Jeremy Mann, Heith Jeffcoat, Lauren Pennington, Adrienne Minecci, Silviya McCool, John Paul Franz, Lindsey Anderson, Alison Barklage, Spilios Asimakopoulos, Lynn Hall, Nidhi Saxena, Katie Mazuk, Jasmeet Singh, Silas Martin, L.D. Platt, Daphne Longbothum, Hattie McKelvey, Heather Schoenly, John King, William Robinson, Alison Barklage, Quinton Kinne, and William Shontz.

Elizabeth H. Snow, Esq.
September 13, 2024
Page 4

with respect to these Requests.” Apr. 26, 2024 Ltr. from I. Eppler to E. Snow at 4. In the intervening four months, SaveOnSP has never pressed these terms. And with good reason: SaveOnSP has been unable to establish that Mr. White and Ms. Penkowski have any relevance with respect to this vendor outside of [REDACTED]

[REDACTED] Aug. 13, 2024 Ltr. from E. Snow to J. Long at 2 (citing JJHCS_00231138).

JJHCS also objects to the overbreadth of SaveOnSP’s term which continues to rely on “w/50” despite Judge Wolfson’s clear guidance and SaveOnSP’s own recognition that “commonly used word[s]” with a “w/50’ connector might . . . pick[] up irrelevant documents.” SaveOnSP’s Aug. 30, 2024 Mot. at 6-7 (addressing RIS RX and TrialCard search terms). There is no basis to depart from that sound guidance here. Accordingly, JJHCS will not run the terms below. In the spirit of compromise and finality, JJHCS notes that it reviewed the five search hits identified below, all of which were false hits.

SaveOnSP’s Proposal	Search Hits	Search Hits (Family Inclusive)
(RIS OR RISRx) w/50 identif*	5	79
(RIS OR RISRx) w/50 (accumulator* OR maximizer* OR CAPm OR CAPa OR “adjustment program”)	0	0

III. TrialCard Statements of Work

SaveOnSP also asks JJHCS to run “additional search terms related to negotiations for TrialCard Statements of Work over White’s and Penkowski’s files.” Aug. 13, 2024 Ltr. from E. Snow to J. Long at 3. JJHCS will not do so.

Over JJHCS’s objection, SaveOnSP insisted that JJHCS run a search term hitting on over 6,000 documents (family inclusive) based on faulty search logic. As JJHCS explained in March, that term (copied below) required that JJHCS review “every document that contains any mention of TrialCard along with Statements of Work or contracts in the files of these apex custodians,” despite JJHCS’s agreement to “search for and produce final contracts and statements of work with Trial Card from non-custodial sources.” Mar. 20, 2024 Opp. to Mot. to Compel at 10.

- (“TrialCard” OR “Trial Card” OR TC) AND ((statement* /5 work) OR “SOW*” OR contract*) AND (CarePath OR (care w/2 path) OR Carpath OR Carepth OR CP OR JCP OR “Savings Program” OR “WithMe” OR (with w/2 me)) AND (BALVERSA OR DARZALEX OR ERLEADA OR IMBRUVICA OR OPSUMIT OR PREZCOBIX OR REMICADE OR RYBREVANT OR SIMPONI OR STELARAOR OR SYMTUZA OR TRACLEER OR TREMFYA OR UPTRAVI OR VENTAVIS OR ZYTIGA)

Elizabeth H. Snow, Esq.
September 13, 2024
Page 5

Despite the overbreadth of this term, at Judge Wolfson's direction, JJHCS has now reviewed and produced non-privileged, responsive document hitting on this term, as well as its promised production from non-custodial sources. Still unsatisfied, SaveOnSP now claims that its overbroad term "was too restrictive and that additional search terms are warranted" to capture documents "related to negotiations for TrialCard Statements of Work." Aug. 13, 2024 Ltr. from E. Snow to J. Long at 3. JJHCS disagrees. Surely, the parties' agreed-upon term, which relies on overbroad "AND" connectors, would capture every document with variations of "TrialCard," "statement" in close proximity to "work," the name of the relevant JJHCS program (i.e., CarePath), and the drugs at issue in the litigation—regardless of where those words appeared within the documents. There is no basis for SaveOnSP to demand more.

JJHCS also objects to the overbreadth of SaveOnSP's term which continues to rely on "w/50" despite Judge Wolfson's clear guidance. *See* Dkt. No. 283 at 3. As SaveOnSP well knows, "commonly used word[s]" with a "'w/50' connector might . . . pick[] up irrelevant documents." SaveOnSP's Aug. 30, 2024 Mot. at 6-7 (addressing RIS RX and TrialCard search terms). Again, there is no reason to depart from that sound logic here. Accordingly, JJHCS will not review documents hitting on the following search terms.

SaveOnSP's Proposal	Search Hits	Search Hits (Family Inclusive)
(TC OR TrialCard OR "Trial Card") w/50 identif*	215	581
(TC OR TrialCard OR "Trial Card") w/50 (accumulator* OR maximizer* OR CAPm OR CAPa OR "adjustment program")	33	73

IV. Pre-2016 Terms and Conditions

In your August 13, 2024 letter, you also ignore our prior correspondence setting forth our detailed relevance and burden objections related to SaveOnSP's demands that JJHCS add Scott White as a custodian for the January 1, 2009 to April 1, 2016 period. For the avoidance of doubt, we repeat that here.

At SaveOnSP's insistence, JJHCS now has added eight of the nine custodians SaveOnSP requested and reviewed over 30,000 documents for this early time period. JJHCS maintains its relevance and burden objections concerning adding Mr. White as a custodian. June 26, 2024 Ltr. from J. Long to E. Snow at 3-4; July 8, 2024 Ltr. from J. Long to E. Snow at 1-2. As we explained therein:

As to Mr. White, in your June 26, 2024 letter, you claim that Mr. White "is likely to possess relevant documents and would be an appropriate custodian" for the period January 1, 2009 to April 1, 2016 without further citation and that SaveOnSP "will address its request under [] separate cover." June 26, 2024 Ltr. from E. Snow to J. Long at 1. For the avoidance of doubt, JJHCS maintains its

Elizabeth H. Snow, Esq.
September 13, 2024
Page 6

relevance and burden objections. In our June 14, 2024 letter, we explained that SaveOnSP's insistence that JJHCS add "Mr. White as a custodian is a patent end-run around Judge Wolfson's prior orders, made evidence by the failure of SaveOnSP to identify any documents or other evidence in support of its request." June 14, 2024 Ltr. from J. Long to E. Snow at 2; *see also* Jan. 24, 2024 Tr. at 128:14–25 (emphasizing that the search terms applicable to apex custodians, including Mr. White, "are going to be limited search terms. I do understand they are high level executives"). JJHCS also quantified the burden associated with adding Mr. White as a custodian for the January 1, 2009 to April 1, 2016 period. *See* June 14, 2024 Ltr. from J. Long to E. Snow at 3, Ex. B. Those objections only prove more relevant now that JJHCS has agreed to six additional custodians for this period—resulting in eight total JJHCS custodians for the period January 1, 2009 to April 1, 2016. There is no need for a ninth custodian on this topic—let alone a high-ranking executive who had no direct involvement or responsibility for drafting terms and conditions.

July 8, 2024 Ltr. from J. Long to E. Snow at 1-2.

JJHCS also maintains its burden objection to SaveOnSP's proposed term, which would require the review of over 4,800 documents (family inclusive).

SaveOnSP's Proposal	Search Hits	Search Hits (Family Inclusive)
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/10 ((term* w/3 condition) OR "T&C" OR "TNC" OR "other offer" OR "coupon*" OR "discount*" OR "free trial" OR "prescription savings card*")	1,214	4,809

V. Terms and Conditions

SaveOnSP also asks that JJHCS run four search terms related to CarePath's terms and conditions ("CarePath's T&Cs"). JJHCS will not do so. As a threshold matter, as detailed in JJHCS's September 10, 2024 Opposition brief, JJHCS already has reviewed nearly 130,000 documents (family inclusive) hitting on search terms CarePath's T&Cs. There is no basis for SaveOnSP to demand more.

Elizabeth H. Snow, Esq.
September 13, 2024
Page 7

JJHCS also notes that it agreed to run three of these terms explicitly as compromise proposals a short time before SaveOnSP's renewed demands. *See* July 3, 2024 Ltr. from J. Long to E. Snow; June 14, 2024 Ltr. from J. Long to E. Snow; May 24, 2024 Ltr. from J. Long to E. Snow. As we explained in that correspondence, SaveOnSP's reservation of rights "'to request that [JJHCS] run this term over the files of additional custodians' . . . cannot be reconciled with the terms of JJHCS's proposal, which was made in the interest of finality and compromise. . . . While we are prepared to run this term over the identified custodians, we reject your attempt to renegotiate the scope of this term and 'reserve' the right to demand more.'" May 24, 2024 Ltr. from J. Long to E. Snow at 2 (quoting May 1, 2024 Ltr. from E. Snow to J. Long at 2). We reiterate: it is unproductive for SaveOnSP to continue to pocket JJHCS's good faith offers to compromise—only to turn around and demand endless rounds of discovery.

Finally, to the extent that SaveOnSP also demands that JJHCS run the same term at issue in its August 23, 2024 motion to compel—((violat* OR bar* OR prohibit* OR breach* OR preclude* OR allow* OR permit*) w/50 (accumulat* OR maximiz*)) w/50 ("other offer*" OR coupon* OR discount* OR "savings card*" OR "free trial*")—JJHCS refers SaveOnSP to its September 10, 2024 opposition brief and its August 7, 2024 letter addressing JJHCS's objections to this term.

SaveOnSP's Proposal	Search Hits	Search Hits (Family Inclusive)
((coupon* OR discount* OR "prescription savings card*" OR "free trial*") w/30 (Janssen OR Jannsen OR Jansen OR CarePath OR "Care Path" OR CP OR JCP OR "Savings Program")) AND (accumulat* OR maximiz*) AND (enforc* OR eligib* OR ineligib*)	472	2,415
(Janssen OR Jannsen OR Jansen OR CarePath OR "Care Path" OR CP OR JCP OR "Savings Program") AND ((term* w/3 condition) OR T&C OR TNC OR "other offer") AND (maximiz* OR accumulat*)	92	449
((violat* OR bar* OR prohibit* OR breach* OR preclude* OR allow* OR permit*) w/50 (accumulat* OR maximiz*)) w/50 ("other offer*" OR coupon* OR discount* OR "savings card*" OR "free trial*")	157	507
(revis* OR rewrit* OR chang* OR maximizer* OR accumulator*) AND (term* OR condition*) w/50 (Stelara OR Tremfya) w/50 (CarePath OR "Care Path" OR CP OR JCP OR WithMe)	0	0

Elizabeth H. Snow, Esq.
September 13, 2024
Page 8

Very truly yours,

/s/ Julia Long
Julia Long

Exhibit 17



July 8, 2024

Julia Long
(212) 336-2878

VIA EMAIL

Elizabeth H. Snow, Esq.
Selendy Gay, PLLC
1290 Avenue of the Americas
New York, NY 10104

**Re: Timing of JJHCS's Forthcoming Productions
 Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,
 2:23-cv-02632 (JKS) (CLW)**

Dear Elizabeth:

We write in response to SaveOnSP's June 26, 2024 letter concerning JJHCS's production of documents regarding the drafting of CarePath's terms and conditions.

I. Custodians

We previously agreed to add five custodians—Andrea Winkler, Karen Lade, Adrienne Minecci, Jeff Doherty, and Rhonda Burden—for the period January 1, 2009 to April 1, 2016, subject to agreement on search terms. SaveOnSP continues to demand two additional custodians: Darryl Stiles and Scott White. We address each request below.

As to Mr. Stiles, in our June 14, 2024 letter, JJHCS stated that it continued to investigate the availability of Mr. Stiles's documents from the January 1, 2009 to April 1, 2016 period, as well as the burden associated with adding Mr. Stiles as a custodian. *See* June 14, 2024 Ltr. from J. Long to E. Snow at 3. JJHCS now has completed that investigation, and as with the custodians referenced above, JJHCS is prepared to produce non-privileged, responsive documents from Mr. Stiles's files to the extent those documents were maintained in the ordinary course of business and subject to agreement on appropriate search terms.

As to Mr. White, in your June 26, 2024 letter, you claim that Mr. White "is likely to possess relevant documents and would be an appropriate custodian" for the period January 1, 2009 to April 1, 2016 without further citation and that SaveOnSP "will address its request under [] separate cover." June 26, 2024 Ltr. from E. Snow to J. Long at 1. For the avoidance of doubt, JJHCS maintains its relevance and burden objections. In our June 14, 2024 letter, we explained that SaveOnSP's insistence that JJHCS add "Mr. White as a custodian is a patent end-run around Judge Wolfson's prior orders, made evidence by the failure of SaveOnSP to identify any documents or other evidence in support of its request." June 14, 2024 Ltr. from J. Long to E. Snow

Elizabeth H. Snow, Esq.
July 8, 2024
Page 2

at 2; *see also* Jan. 24, 2024 Tr. at 128:14–25 (emphasizing that the search terms applicable to apex custodians, including Mr. White, “are going to be limited search terms. I do understand they are high level executives”). JJHCS also quantified the burden associated with adding Mr. White as a custodian for the January 1, 2009 to April 1, 2016 period. *See* June 14, 2024 Ltr. from J. Long to E. Snow at 3, Ex. B. Those objections only prove more relevant now that JJHCS has agreed to six additional custodians for this period—resulting in eight total JJHCS custodians for the period January 1, 2009 to April 1, 2016. There is no need for a ninth custodian on this topic—let alone a high-ranking executive who had no direct involvement or responsibility for drafting terms and conditions.

II. Search Terms

JJHCS objects to SaveOnSP’s proposed search terms,¹ which would require the review of 38,460 documents (family inclusive) from the files of Ms. Winkler, Ms. Minecci, Ms. Lade, Mr. Doherty, Ms. Burden, and Mr. Stiles for the period August 1, 2009 to April 1, 2016.² As a threshold matter, SaveOnSP’s latest demand continues to avoid providing any response to our concerns regarding the appropriate proximity limiter—insisting again on a “w/50” limiter for one of its two terms. This is unproductive. As you know, Judge Wolfson has endorsed tighter proximity limiters in recent orders to mitigate the burden associated with specific requests. *See* May 9, 2024 Order at 3 (noting the potential overbreadth of w/50 limiters).

SaveOnSP continues to make these overbroad demands despite JJHCS’s willingness to run the compromise term below. In our June 14, 2024 letter, we disclosed that this term would require the review of 16,446 documents (family inclusive) across Ms. Winkler’s, Ms. Minecci’s, Ms. Lade’s, Mr. Doherty’s, and Ms. Burden’s files. JJHCS is prepared to agree to

¹ SaveOnSP proposes the following search terms:

- (CarePath OR “Savings Program” OR “Rebate Program” OR “Access Program” OR “copay assistance” OR “Instant Savings Card” OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Upravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/50 ((term* w/3 condition) OR “T&C” OR “TNC”)
- (CarePath OR “Savings Program” OR “Rebate Program” OR “Access Program” OR “copay assistance” OR “Instant Savings Card” OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Upravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/30 (“other offer” OR “coupon*” OR “discount*” OR “free trial” OR “prescription savings card”)

² Further information regarding these search terms is provided in Exhibit A in the form requested by SaveOnSP.

Elizabeth H. Snow, Esq.
July 8, 2024
Page 3

the same term as to Mr. Stiles's files, which would require the review of 17,303 documents (family inclusive) across the six custodians at issue, subject to SaveOnSP's agreement that this resolves the parties' dispute. Please confirm whether SaveOnSP will accept this proposal.

- (CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR Instant Savings Card OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/10 ((term* w/3 condition) OR "T&C" or "TNC" OR "other offer" OR "coupon*" OR "discount*" OR "may not be used with any other coupon, discount, prescription savings card, free trial, or other offer")

We remain available to meet and confer.

Very truly yours,

/s/ Julia Long

Julia Long

Exhibit A: Hit Counts

Total Additional Search Hits	15,049
Total Additional Search Hits + Families	37,776

Custodians: Rhonda Burden, Jeffrey Doherty, Karen Lade, Adrienne Minecci,
Darryl Stiles, and Andrea Winkler

Date Range: January 1, 2009 to April 1, 2016

Search Term Proposed by SaveOnSP	Additional Documents Hitting on Term	Additional Documents Hitting on Term + Families
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/30 coupon*	8,969	20,876
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/30 discount*	8,333	26,050

Search Term Proposed by SaveOnSP	Additional Documents Hitting on Term	Additional Documents Hitting on Term + Families
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/30 "free trial"	6,649	17,338
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/30 "prescription savings card*"	4,274	12,281
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/30 "other offer"	3,918	11,676

Exhibit 18



October 22, 2024

Julia Long
(212) 336-2878

VIA EMAIL

Elizabeth H. Snow, Esq.
Selendy Gay, PLLC
1290 Avenue of the Americas
New York, NY 10104

Re: Apex Search Terms
Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,
2:23-cv-02632 (JKS) (CLW)

Dear Elizabeth:

We write in response to SaveOnSP's September 27, 2024 letter and further to JJHCS's September 13, 2024 letter concerning SaveOnSP's request that JJHCS add additional search terms over the custodial files of Scott White and Blasine Penkowski.

As a threshold matter, SaveOnSP's is wrong to claim that its requests "comply with Judge Wolfson's directives because each search term is limited to capture files on topics where White and Penkowski demonstrably took active roles." Sept. 27, 2024 Ltr. from E. Snow to J. Long at 1. As detailed below, SaveOnSP's search terms would require JJHCS to review more than 10,000 additional documents (family inclusive). This comes despite Judge Wolfson's clear guidance that search terms for Mr. White and Ms. Penkowski should be "[v]ery limited." Jan. 24, 2024 Tr. at 128:14–17. And SaveOnSP's demands continue to grow: in SaveOnSP's latest letter, it adds two terms related to RIS RX without any meaningful narrowing of SaveOnSP's laundry list of demands.

I. Diversion Programs

SaveOnSP continues to request that JJHCS run two overbroad search terms involving the term "diversion programs." See Sept. 27, 2024 Ltr. from E. Snow to J. Long at 2. Your latest letter acknowledges that the phrase "diversion program" refers to not just "accumulators and maximizers," but nevertheless claims that such a search term is appropriate under Judge Wolfson's guidance because JJHCS purportedly used the term "diversion program" as a "moniker" for SaveOnSP. *Id.* (citing Feb. 6, 2024 Order at 29; Apr. 10, 2024 Order at 3).

Tellingly, neither citation that SaveOnSP provides supports this proposition. For example, in the April 10, 2024 Order, Judge Wolfson referred to the parties' agreement at the April

Elizabeth H. Snow, Esq.
October 22, 2024
Page 2

3, 2024 conference related to an “NEHB” or “EHB” search term. *See* Apr. 10, 2024 Order at 3. But as SaveOnSP well knows, the parties agreed on the record to the following search term—which includes a proximity limiter of the same variety that JJHCS now proposes: (“essential health benefit*” OR EHB* OR “non-essential health benefit” OR “nonessential health benefit*” OR NEHB*) w/50 (“CAPa” OR CAPm” OR “adjustment program” OR accumulat* OR maximiz*). *See* Apr. 17, 2024 Ltr. from E. Wohlforth to J. Wolfson at 4. There is no reason why the term “diversion program” should be treated any differently.

Once again, in the interest of compromise, JJHCS is prepared to run the following terms, subject to SaveOnSP’s agreement that this resolves the parties’ dispute.

SaveOnSP’s Aug. 2024 Proposal	JJHCS’s Sept. 2024 Counter	SaveOnSP’s Sept. 2024 Counter	JJHCS’s Oct. 2024 Counter
Diver* w/25 (copay* OR “co pay*” OR co-pay* OR (CarePath w/5 fund*) OR “patient assistance”) 1,252 documents (family inclusive)	Diversi on * w/25 (copay* OR “co pay*” OR co-pay* OR (CarePath w/5 fund*) OR “patient assistance”) w/25 (maximiz* OR accumul at *) 130 documents (family inclusive)	(divert* OR divers ion *) w/25 (copay* OR “co pay*” OR (CarePath w/5 fund*) OR “patient assistance”) 1,076 documents (family inclusive)	(divert* OR divers ion *) w/25 (copay* OR “co pay*” OR (CarePath w/5 fund*) OR “patient assistance”) w/25 (“CAPa” OR CAPm” OR “adjustment program” OR accumul at * OR maximiz*) 127 documents (family inclusive)
“diversion program*” 751 documents (family inclusive)	“diversion program*” w/25 (maximiz* OR accumul at *) 67 documents (family inclusive)	“diversion program*” 751 documents (family inclusive)	“diversion program*” w/25 (“CAPa” OR CAPm” OR “adjustment program” OR accumul at * OR maximiz*) 67 documents (family inclusive)

Please confirm whether SaveOnSP will accept JJHCS’s counterproposal.

Elizabeth H. Snow, Esq.
October 22, 2024
Page 3

II. RIS RX

SaveOnSP continues to demand that JJHCS run two newly expanded RIS RX related search terms over Scott White's files. In your August 13, 2024 letter, you claimed Mr. White was relevant because [REDACTED]. See Aug. 13, 2024 Ltr. from E. Snow to J. Long at 2 (citing JJHCS_00231138). In our September 13, 2024 response, we explained that we reviewed JJHCS_00231138 and that it did not support SaveOnSP's demand for a search term. To be clear, in that email chain [REDACTED]

[REDACTED]
JJHCS_00231138. [REDACTED]
[REDACTED]
[REDACTED]

Id. [REDACTED]
[REDACTED]

[REDACTED] *Id.*

In response, you claim that "[e]ven if the final authorization was made verbally, it is unlikely that [White] approved a \$12 million expenditure without a single document reflecting that approval." Sept. 27, 2024 Ltr. from E. Snow to J. Long at 2-3. Based on this hypothesis, SaveOnSP demands broader search terms over a seven-year time period because SaveOnSP's previous proposal did "not capture those relevant documents and communications." *Id.* JJHCS will not indulge this fishing expedition. As a threshold matter, SaveOnSP continues to ignore JJHCS_00231138 [REDACTED]. And so, SaveOnSP has the deck that it purportedly seeks.

But even setting that aside, two fundamental problems still exist as to SaveOnSP's demanded search terms: (1) SaveOnSP seeks a search term for a six-year period before the presentation to White (i.e., April 1, 2016 to December 31, 2022); and (2) nowhere does JJHCS_00275060 use the term "BI" or "benefits investigation" as SaveOnSP now demands. Accordingly, JJHCS will not run the terms below.¹

SaveOnSP's Proposal	Search Hits	Search Hits (Family Inclusive)
(RIS OR RISRx) AND ((Benefit* w/5 Investigation*) OR B.I. OR "BI's" OR BIs OR "B.I.'s")	52	156

¹ SaveOnSP continues to claim that JJHCS is running these terms as to other custodians. Again, JJHCS offered to run these terms, but SaveOnSP did not accept JJHCS's proposal and, indeed, has ignored JJHCS's related letter for months. See July 3, 2024 Ltr. from J. Long to E. Snow at 2.

Elizabeth H. Snow, Esq.
October 22, 2024
Page 4

(RIS OR RISRx) AND BI (<i>case sensitive</i>)	51	288
---	----	-----

III. TrialCard Statements of Work

SaveOnSP repeats its request that JJHCS run two search terms “related to negotiations for TrialCard Statements of Work.” Sept. 27, 2024 Ltr. from E. Snow to J. Long at 3. SaveOnSP’s only new argument is that the “hit counts provided” in JJHCS’s September 13, 2024 letter “confirm that White and Penkowski likely have additional relevant documents in their custodial files.” *Id.* But SaveOnSP offers no reasoned basis for that speculation, particularly where both terms continue to rely on loose proximity connectors and the first of SaveOnSP’s terms uses the common word “identify” as its only connection. *See* SaveOnSP’s Aug. 30, 2024 Mot. at 6-7 (“commonly used word[s]” with a “w/50’ connector might . . . pick[] up irrelevant documents”). Accordingly, JJHCS will not review documents hitting on the following search terms.

SaveOnSP’s Proposal	Search Hits	Search Hits (Family Inclusive)
(TC OR TrialCard OR “Trial Card”) w/50 identif*	215	581
(TC OR TrialCard OR “Trial Card”) w/50 (accumulator* OR maximizer* OR CAPm OR CAPa OR “adjustment program”)	33	73

IV. Pre-2016 Terms and Conditions

In your September 27, 2024 letter, you point to JJHCS_00225849 as a basis to revisit adding Scott White as a custodian for the January 1, 2009 to April 1, 2016 period. We disagree. JJHCS_00225849 is [REDACTED]

Id. [REDACTED]

Id. [REDACTED]

[REDACTED]. JJHCS_00225849. [REDACTED]

[REDACTED] *Id.* Accordingly, JJHCS will not add Mr. White as a custodian for this time period.

JJHCS also maintains its burden objection to SaveOnSP’s proposed term, which would require the review of over 4,800 documents (family inclusive).

Elizabeth H. Snow, Esq.

October 22, 2024

Page 5

SaveOnSP's Proposal	Search Hits	Search Hits (Family Inclusive)
(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Uptravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/10 ((term* w/3 condition) OR "T&C" OR "TNC" OR "other offer" OR "coupon*" OR "discount*" OR "free trial" OR "prescription savings card*"))	1,214	4,809

V. Terms and Conditions

SaveOnSP repeats its demands that JJHCS run three search terms related to CarePath's terms and conditions ("CarePath's T&Cs"). For the reasons stated in our September 13, 2024 letter, JJHCS will not do so.

SaveOnSP's Proposal	Search Hits	Search Hits (Family Inclusive)
((coupon* OR discount* OR "prescription savings card*" OR "free trial*") w/30 (Janssen OR Jannsen OR Jansen OR CarePath OR "Care Path" OR CP OR JCP OR "Savings Program")) AND (accumulat* OR maximiz*) AND (enforc* OR eligib* OR ineligib*)	472	2,415
(Janssen OR Jannsen OR Jansen OR CarePath OR "Care Path" OR CP OR JCP OR "Savings Program") AND ((term* w/3 condition) OR T&C OR TNC OR "other offer") AND (maximiz* OR accumulat*)	92	449
((violat* OR bar* OR prohibit* OR breach* OR preclude* OR allow* OR permit*) w/50 (accumulat* OR maximiz*)) w/50 ("other offer*" OR coupon* OR discount* OR "savings card*" OR "free trial*"))	157	507

In addition, JJHCS notes that Judge Wolfson has now rejected the third of these terms (SaveOnSP's so-called "May-Not-Use" search term). JJHCS will agree to run the following narrowed term, subject to SaveOnSP's agreement that this resolves the parties' dispute. Please advise whether SaveOnSP will accept this proposal:

Elizabeth H. Snow, Esq.

October 22, 2024

Page 6

- ((violat* OR bar* OR prohibit* OR breach* OR preclude* OR allow* OR permit*)
w/25 (accumulat* OR maximiz*)) w/40 (“other offer*” OR coupon* OR discount* OR
“savings card*” OR “free trial*”)

Very truly yours,

/s/ Julia Long

Julia Long

Exhibit 19



July 25, 2024

Julia Long
(212) 336-2878

VIA EMAIL

Elizabeth H. Snow, Esq.
Selendy Gay, PLLC
1290 Avenue of the Americas
New York, NY 10104

**Re: Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,
2:23-cv-02632 (JKS) (CLW)**

Dear Elizabeth:

We write in response to SaveOnSP's July 17, 2024 letter concerning JJHCS's production of documents regarding the drafting of CarePath's terms and conditions.

In your letter, you request that JJHCS run the following term over the custodial files of Andrea Winkler, Karen Lade, Adrienne Minecci, Jeff Doherty, Rhonda Burden, and Darryl Stiles for the time period January 1, 2009 to April 1, 2016. JJHCS agrees to do so.

- (CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Upravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/10 ((term* w/3 condition) OR "T&C" OR "TNC" OR "other offer" OR "coupon*" OR "discount*" OR "free trial" OR "prescription savings card*")

Very truly yours,

/s/ Julia Long
Julia Long

Exhibit 20



August 8, 2024

Julia Long
(212) 336-2878

By Email

Meredith Nelson, Esq.
Selendy Gay PLLC
1290 Avenue of the Americas
New York, NY 10104

Re: SaveOnSP's Search Parameters
Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC,
Case No. 2:22-cv-02632 (JKS) (CLW)

Dear Meredith:

We write in response to your August 1, 2024 letter requesting “the list of search terms [JJHCS] has run over its custodial files, including date ranges.” Aug. 1, 2024 Ltr. from M. Nelson to J. Long. JJHCS has enclosed its search parameters as Appendix 1.

As with SaveOnSP's letter, please note that this list does not reflect search terms subject to ongoing negotiations between the parties.

Very truly yours,

/s/ Julia Long

Julia Long

Appendix 1: JJHCS Search Parameters

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	(CAPa OR CAPm OR "adjustment program") AND (SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp)
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	"Save On" (case sensitive)
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp OR "Jody Miller" OR "Ron Krawczyk"
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	"save on" w/50 (accumulat* OR maximiz* OR "essential health benefit*" OR EHB* OR "non-essential health benefit*" OR "nonessential health benefit*" OR NEHB* OR accredo OR ESI OR "express scripts")
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	("Express Scripts" OR ESI OR ExpressScripts) w/50 (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	(Accredo OR Acredo) w/50 (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	"other offer" w/5 (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	CAPa OR CAPm OR "adjustment program" AND "Save On" (case sensitive)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp OR "Jody Miller" OR "Ron Krawczyk"

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	"Save On" (case sensitive)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	"save on" w/50 (accumulat* OR maximiz* OR "essential health benefit*" OR EHB* OR "non-essential health benefit*" OR "nonessential health benefit*" OR NEHB* OR accredo OR ESI OR "express scripts")
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(Accredo OR Acredo) w/50 (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	("Express Scripts" OR ESI OR ExpressScripts) w/50 (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	"essential health benefit*" OR EHB* OR "non-essential health benefit*" OR "nonessential health benefit*" OR NEHB*

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(essential OR nonessential OR non-essential OR "non essential") w/50 ("Affordable Care Act" OR ACA OR Obamacare)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(STELARA* OR TREMFYA* OR CarePath OR JCP OR "Savings Program") w/25 (6000 OR 6,000 OR limit OR eliminate)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	"other offer" w/5 (accumulat* OR maximiz* OR "health plan*" OR insur*)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	"This program offer may not be used with any other coupon, discount, prescription savings card, free trial, or other offer"
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(Fein OR Pembroke OR Adam OR "Drug Channels") AND afein@drugchannels.net AND (SaveOnSP OR accumulat* OR maximiz*)

Date Range	Custodians	Search Term
7/1/2022 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(CAPa OR CAPm OR "adjustment program") AND (SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp)
7/1/2022 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; JJHCS; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	CAPa OR CAPm OR "adjustment program" AND "Save On" (case sensitive)
4/1/2016 to 11/7/2023	Lade, Karen	accumulator w/5 prog*
4/1/2016 to 11/7/2023	Lade, Karen	PBM* w/50 ((chang* OR increas* OR decreas*) AND (copay* OR co-pay*) AND deductible)
4/1/2016 to 11/7/2023	Lade, Karen	((Max* w/15 benefit*) w/50 (chang* OR increas* OR decreas*)) AND (\$20,000 OR \$20K OR 20k)
4/1/2016 to 11/7/2023	Martin, Silas	SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp
4/1/2016 to 11/7/2023	Martin, Silas	"Save On" (case sensitive)
4/1/2016 to 11/7/2023	Martin, Silas	(accumulat* OR maximiz* OR "essential health benefit*" OR EHB* OR "non-essential health benefit" OR "nonessential health benefit" OR NEHB* OR "Affordable Care Act" OR ACA OR Obamacare) w/25 (report* OR article* OR post* OR "white paper" OR WP OR analy* OR sponsor* OR partner*)
4/1/2016 to 11/7/2023	Martin, Silas	(accumulator* OR maximizer* OR copay OR co-pay OR CAP) w/25 (impact* OR effect* OR patient* OR equity)

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023	Martin, Silas	(IQVIA OR Excenda OR "Analysis Group" OR Xcenda OR "The Eagle Force") w/25 (accumulator* OR maximizer* OR copay OR co-pay OR CAP)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John; Hall, Evelyn; Hoffman, John; Jeffcoat, Brandon; JJHCS; King, John; Kinne, Quinton; Lade, Karen; Longbothum, Daphne; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, Lawrence; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Shontz, William; Singh, Jasmeet; Kenworthy, Deborah	(CAPa OR CAPm OR "adjustment program") AND (accumulat* OR maximiz*)
1/1/2009 to 1/19/2014 (Wortman); 1/1/2009 to 7/13/2015 (Chapman)	Wortman, Kimberly; Chapman, Katherine	(Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR Stelara OR Tracleer OR Upravi OR Ventavis OR Zytiga) w/25 ((term* w/3 condition) OR T&C OR TNC OR "other offer" OR coupon* OR discount* OR "prescription savings card*" OR "free trial*")
4/1/2016 to 11/7/2023	Barklage, Alison; Hoffman, John; Kinne, Quinton; Longbothum, Daphne; Platt, Lawrence; Shontz, William	("essential health benefit*" OR EHB* OR "non-essential health benefit" OR "nonessential health benefit*" OR NEHB*) w/50 (CAPa OR CAPm OR "adjustment program")
1/1/2009 to 1/19/2014 (Wortman); 1/1/2009 to 7/13/2015 (Chapman)	Wortman, Kimberly; Chapman, Katherine	(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR Instant Savings Card OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Upravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/50 ((term* w/3 condition) OR "T&C" OR "TNC" OR "other offer" OR "coupon*" OR "discount*" OR "prescription savings card*" OR "free trial")

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(Janssen OR Jannsen OR Jansen OR CarePath OR "Care Path" OR CP OR JCP OR "Savings Program") AND ((term* w/3 condition) OR T&C OR TNC OR "other offer") AND (maximiz* OR accumulat*)
1/1/2021 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	(revis* OR rewrit* OR chang* OR maximizer* OR accumulator*) AND (((term* OR condition*) w/50 (Stelara OR Tremfya)) w/50 (CarePath OR "Care Path" OR CP OR JCP OR WithMe))
4/1/2016 to 11/7/2023	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John Paul; Hall, Lynn; Hoffman, John; Jeffcoat, Heith; Kenworthy, Debbie; King, John; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D; Robinson, William; Saxena, Nidhi; Schoenly, Heather; Singh, Jasmeet	Archbow w/50 (accumulator* OR maximizer* OR mitigat* OR NEHB OR (variable w/5 EHB) OR CAPa OR CAPm OR "adjustment program")
4/1/2016 to 11/7/2023	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John Paul; Hall, Lynn; Hoffman, John; Jeffcoat, Heith; Kenworthy, Debbie; King, John; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D; Robinson, William; Saxena, Nidhi; Schoenly, Heather; Singh, Jasmeet	Archbow w/50 "other offer"

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John Paul; Hall, Lynn; Hoffman, John; Jeffcoat, Heith; Kenworthy, Debbie; King, John; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D; Robinson, William; Saxena, Nidhi; Schoenly, Heather; Singh, Jasmeet	Avalere w/50 (accumulator* OR maximizer* OR mitigat* OR NEHB OR (variable w/5 EHB) OR CAPa OR CAPm OR "adjustment program")
4/1/2016 to 11/7/2023	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John Paul; Hall, Lynn; Hoffman, John; Jeffcoat, Heith; Kenworthy, Debbie; King, John; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D; Robinson, William; Saxena, Nidhi; Schoenly, Heather; Singh, Jasmeet	Avalere w/50 "other offer"
1/1/2021 to 11/7/2023	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John Paul; Hall, Lynn; Jeffcoat, Brandon; King, John; Kinne, Quinton; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D.; Robinson, William; Saxena, Nidhi; Schoenly, Heather; Shontz, William; Singh, Jasmeet	(RIS OR RISRx) w/50 identif*
4/1/2016 to 7/1/2022	Anderson, Lindsey; Asimakopoulos, Spilios; Barklage, Alison; Franz, John Paul; Hall, Lynn; Jeffcoat, Brandon; King, John; Kinne, Quinton; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D.; Robinson, William; Saxena, Nidhi; Schoenly, Heather; Shontz, William; Singh, Jasmeet	"CAPm" OR "CAPa" OR "adjustment program"

Date Range	Custodians	Search Term
8/1/2022 to 11/7/2023	Platt, L.D.	("Washington Post" OR "the Post" OR WaPo OR WashPost OR washingtonpost.com OR Gurwitch) w/50 ("the company" OR SaveOnSP OR SaveOn OR "Save On SP" OR SOSp OR "Express Scripts" OR ESI OR ExpressScripts)
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	((viabl* OR viability OR insolvent OR "cost prohibitive" OR untenable OR eliminat*) w/25 (CarePath OR JCP)) AND (SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp OR accumulat* OR maximiz* OR "adjustment program**")
1/1/2021 to 11/7/2023	Anderson, Lindsey; Asimakopoulos, Spilios; Hoffman, John; King, John; Mazuk, Katie; McCool, Silviya; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Singh, Jasmeet	IQVIA w/15 (accumulat* OR maximiz* OR copay OR co-pay OR CAP OR CAPa OR CAPm OR "adjustment program")
4/1/2016 to 12/31/2017	Cassano, Michael	"Jody Miller" OR jmiller*
4/1/2016 to 12/31/2017	Cassano, Michael	SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spilios; Franz, John; Hall, Evelyn; Jeffcoat, Brandon; King, John; Lade, Karen; Mann, Jeremy; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Singh, Jasmeet; Kenworthy, Deborah	((coupon* OR discount* OR "prescription savings card*" OR "free trial*") w/30 (Janssen OR Jannsen OR Jansen OR CarePath OR "Care Path" OR CP OR JCP OR "Savings Program")) AND (accumulat* OR maximiz*) AND (enforc* OR eligib* OR ineligib*)
4/1/2016 to 11/7/2023	Hoffman, John; Quinton, Kinne; Lade, Karen; Martin, Silas; Platt, L.D.	(Fein OR Pembroke OR Adam OR "Drug Channels") AND afein@drugchannels.net AND (SaveOnSP OR accumulat* OR maximiz*)

Date Range	Custodians	Search Term
1/1/2009 to 4/1/2016	Burden, Rhonda; Doherty, Jeffrey; Lade, Karen; Minecci, Adrienne; Stiles, Darryl; Winkler, Andrea	(CarePath OR "Savings Program" OR "Rebate Program" OR "Access Program" OR "copay assistance" OR "Instant Savings Card" OR YOU&I OR RemiStart OR AccessOne OR Darzalex OR Imbruvica OR Opsumit OR Remicade OR Simponi OR SimponiOne OR Stelara OR Sylvant OR SylvantOne OR Tracleer OR Upravi OR Ventavis OR Zytiga OR ZytigaOne OR Invokana OR Xarelto OR Olysio OR Risperdal OR Invega) w/10 ((term* w/3 condition) OR "T&C" OR "TNC" OR "other offer" OR "coupon*" OR "discount*" OR "free trial" OR "prescription savings card*")
4/1/2016 to 11/7/2023; 6/1/2023 to 11/7/2023 (Kenworthy only)	Anderson, Lindsey; Asimakopoulos, Spiliotis; Barklage, Alison; Franz, John; Hall, Evelyn; Hoffman, John; Jeffcoat, Brandon; King, John; Kinne, Quinton; Lade, Karen; Longbothum, Daphne; Mann, Jeremy; Martin, Silas; Mazuk, Katie; McCool, Silviya; McKelvey, Hattie; Minecci, Adrienne; Pennington, Lauren; Platt, L.D.; Robinson III, William; Saxena, Nidhi; Schoenly, Heather; Scholz, Carol; Shontz, William; Singh, Jasmeet; Kenworthy, Deborah	(control w/5 plans) w/15 (SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSP OR accumulator* OR maximizer*)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	"Save On" (case sensitive)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	"save on" w/50 (accumulat* OR maximiz* OR "essential health benefit*" OR EHB* OR "non-essential health benefit*" OR "nonessential health benefit*" OR NEHB* OR accredo OR ESI OR "express scripts")
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSP OR "Jody Miller" OR "Ron Krawczyk"
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	("Express Scripts" OR ESI OR ExpressScripts) w/50 (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	(Accredo OR Acredo) w/50 (accumulat* OR maximiz*)

Date Range	Custodians	Search Term
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	(STELARA* OR TREMFYA* OR CarePath OR JCP OR "Savings Program") w/25 (6000 OR 6,000 OR limit OR eliminate)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	(CAPa OR CAPm OR "adjustment program") AND (SaveOnSP OR SaveOn OR "Save On SP" OR "Save OnSP" OR Save-On OR SOSp)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	CAPa OR CAPm OR "adjustment program" AND "Save On" (case sensitive)
1/1/2021 to 11/7/2023	De Camara, Jennifer; Harris, Savaria ¹	(\$6,000 OR \$6k OR 6k OR \$9,100 OR \$8,900 OR OOP OR out-of-pocket) AND (Stelara OR Tremfya)
1/1/2021 to 11/7/2023	De Camara, Jennifer; Harris, Savaria	("other offer" w/5 (accumulat* OR maximiz* OR "health plan*" OR insur*)) AND (Stelara OR Tremfya)
1/1/2021 to 11/7/2023	De Camara, Jennifer; Harris, Savaria	(eligib* OR ineligib*) AND "out-of-pocket cost" AND (Stelara OR Tremfya)
1/1/2021 to 11/7/2023	De Camara, Jennifer; Harris, Savaria	(maximiz* OR optimiz*) AND (\$6,000 OR "maximum program benefit") AND (Stelara OR Tremfya)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	(CAPa OR CAPm OR "adjustment program") AND (accumulat* OR maximiz*)
4/1/2016 to 11/7/2023	Penkowski, Blasine; White, Scott	(TrialCard OR "Trial Card" OR TC) AND ((statement* w/5 work) OR SOW* OR contract*) AND (CarePath OR (care w/2 path) OR Carpath OR Carepth OR CP OR JCP OR "Savings Program" OR WithMe OR (with w/2 me)) AND (Balversa OR Darzalex OR Erleada OR Imbruvica OR Opsumit OR Prezcoibix OR Remicade OR Rybrevant OR Simponi OR Stelara OR Symtuza OR Tracleer OR Tremfya OR Upravi OR Ventavis OR Zytiga OR Edurant OR Intelence OR Ponvory)
4/1/2016 to 11/7/2023	Penkowski, Blasine	((brand* OR finance* OR SCG OR (strategic w/5 customer)) w/25 ("working group" OR guidance OR respond* OR respons*)) AND (accumulat* OR maximiz*)

Date Range	Custodians	Search Term
1/1/2021 to 11/7/2023	De Camara, Jennifer; Harris, Savaria; Penkowski, Blasine; White, Scott	(revis* OR rewrit* OR chang* OR maximizer* OR accumulator*) AND (term* OR condition*) w/50 (Stelara OR Tremfya) w/50 (CarePath OR "Care Path" OR CP OR JCP OR WithMe)
4/1/2016 to 11/7/2023	Harris, Savaria; Penkowski, Blasine; White, Scott	(Fein OR Pembroke OR Adam OR "Drug Channels") AND afein@drugchannels.net AND (SaveOnSP OR accumulat* OR maximiz*)

¹ For Ms. Harris and Ms. De Camara, all search terms apply only to communications with third parties.